

WRIGHT, FINLAY & ZAK, LLP  
Darren T. Brenner, Esq.  
Nevada Bar No. 8386  
Jory C. Garabedian, Esq.  
Nevada Bar No. 10352  
8337 W. Sunset Road, Suite 220  
Las Vegas, Nevada 89113  
(702) 475-7964; Fax: (702) 946-1345  
*Attorneys for Defendant, Nissan Motor Acceptance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

## ROBERT JOHNSON JR.,

Case No.: 2:25-cv-01127

**Plaintiff,**

V.

EXPERIAN INFORMATION SOLUTIONS,  
INC; BACKGROUNDCHECKS.COM LLC;  
CLARITY SERVICES, INC. and NISSAN-  
INFINITY LT LLC

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
RESPONSE TO COMPLAINT  
(FIRST REQUEST)**

### Defendants.

Pursuant to Fed. R. Civ. P. 6(b) and L.R. 7.1(b), Defendant Nissan Motor Acceptance Company LLC, incorrectly plead as Nissan Infinity LT LLC (“NMAC”), by counsel, respectfully request a twenty-eight (28) day enlargement of the time to respond to the Complaint of Plaintiff Robert Johnson Jr. in this action (“Plaintiff”). In support thereof, NMAC states:

1. On June 24, 2025, Plaintiff filed his Complaint in the United States District Court for the District of Nevada.

2. On or around June 26, 2025, NMAC was served with the Complaint.

3. NMAC's deadline to respond to the Complaint is July 17, 2025, and as such has not yet passed.

4. NMAC respectfully requests a twenty-eight (28) day extension of time, through and including August 14, 2025, to respond to Plaintiff's Complaint.

5. Good cause exists for the requested extension. NMAC's counsel has been recently retained and requires additional time to complete its investigation of the allegations in the Complaint and prepare its responsive pleading. In addition, the requested extension will allow additional time for counsel for Plaintiff and counsel for NMAC to confer over the merits of the claims.

6. This is the first motion to extend this deadline to respond to the Complaint sought by NMAC in this matter.

7. This motion is made in good faith and not for purposes of undue delay. No party will be prejudiced by the relief sought.

8. Counsel for Defendant conferred with Plaintiff regarding the extension of time requested herein, who confirmed that Plaintiff does not oppose the relief sought herein.

WHEREFORE, Defendant NMAC respectfully requests that the Court grant this Unopposed Motion and extend the time for NMAC to respond to the Complaint by and through August 14, 2025.

Dated: July 16, 2025

## WRIGHT, FINLAY & ZAK, LLP

/s/ Jory C. Garabedian

---

Jory C. Garabedian, Esq.

Nevada Bar No. 10352

8337 W. Sunset Road, Suite 220

Las Vegas, Nevada 89113

*Attorneys for Defendant, Nissan Motor Acceptance Company*

IT IS SO ORDERED.

Clayna L. Zouchal  
U.S. MAGISTRATE JUDGE

Date: July 16, 2025